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REMARKS

The application comprises claims 1-38, 40-44, 46-47 and 57-65 of which claims 59-61 and 63-65 are rejected. Claims 1-38, 40-44, 46-47 and 57-58 are allowed. Claims 59-65 are currently amended.

35 USC §101

Claims 59-62 are rejected under 35 USC §101 as being directed to non-statutory subject matter. Specifically, Examiner has indicated that no machine or machine related steps are recited. Furthermore, the Examiner has characterized the steps of the methods as being capable of performance by the human mind or a human with the assistance with a pen and paper. Applicants note for the Examiner that these are improper tests for determining statutory subject material, pursuant to the interim PTO Guidelines for Examination released in October 2005. See interim PTO Guidelines for Examination, pp. 42-49. In this case, the proper test for determining whether the claimed invention is statutory is whether the invention produces a useful, concrete and tangible result. See interim PTO Guidelines for Examination, pp. 19-24.

In the present claims 59-62, a concrete, tangible and useful result is produced. To wit, relevant search results are presented to a user based at least in part on an analysis of their interconnectivity to other relevant results.

In order to expedite prosecution, claims 59-61 are amended herein to include that they are "computer-implemented" and claims 63-65 have been amended to add an additional computer element for performing at least one step of the computer-implemented methods.

35 USC §112

Claims 59-62 are rejected under 35 USC §112 as failing to comply with the written description requirement. Applicants respectfully disagree with Examiner, as all essential elements of the claims or their equivalents are described in the specification as filed.

Prior to discussing the rejections of claims 59-62, Applicants point out to the Examiner that these claims have been amended to include that they are "computer-implemented" and dependent claims 63-65 have been amended to add a computer element for performing the methods.

Regarding Claim 59:

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Preamble- In addition to the previously cited support in the specification, support can also be found in the present application at page 8, lines 10-11 and 14-15 which describes that a user uses the search engine for finding sites of interest on the Internet and that the user provides terms and the engine responds with a list of sites that include some of the terms. This clearly describes generating documents relevant to a search query, especially in view of the fact that in the electronic document arts finding a site includes finding the documents associated with that site.

First limitation- In addition to the previously cited support in the specification, support can also be found for "obtaining an initial set of documents relevant to a search query" at page 8, lines 10-11 and 14-15 in the present application. Furthermore, performing a keyword search inherently returns results relevant to the search query, and which in the electronic document arts includes websites, web pages and other electronic documents. Thus, the previously cited support at page 9, line 31 is sufficient to provide basis for the first limitation of claim 59.

Second limitation- In addition to the previously cited support in the specification, support can also be found in the "General" section of the application, which starts on page 8, where it clearly states that a purpose of the inventions described in the specification is to assist an interested user in finding one or a small number of relevant sites. Page 9, lines 16-17. This section further states that the methods described following this General section are, *inter alia*, for providing this assistance. One of these methods is described at page 10, lines 6-26 where it is taught that a rank (i.e. score) is assigned to certain sites based on cross references between the sites, see especially line 16 with regards to the cross referencing and lines 22-26 for an exemplary method of ranking/scoring. Not only is it stated prior to the description of this methodology that this method is for providing relevant search results to the user, it is implicit in the description that any ranking of search results is to assist the user in finding sites most relevant to the search.

Moreover, the specification at page 6, lines 1-3 indicates that ranking comprises ranking responsive to the presence of at least one key word in pages of the search result list, which those skilled in the art know is also used for determining relevance to the search query.

Third limitation- Applicants respectfully disagree with the Examiner's contention that "sorting the documents" is not described in the present application. Attached hereto as Exhibit A is a definition of "sorting" from www.dictionary.com. Sorting is defined as arranging according to class, kind, or size; to classify; or to separate from others.

Methods described in the application provide sorting of search results or documents. In some embodiments of the invention, sorting is accomplished by: a) ranking search results and then

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b) selecting some or all of these search results for further analysis (e.g. filtering). This is described at page 10, line 22 to page 11, line 7. Ranking search results and then filtering them, optionally by rank, is arranging them according to class or classifying them since filtering by definition creates classes (results which get filtered out and those that do not). Therefore, "collating and ranking search results" and then "filtering sites" are in fact the same as "sorting".

Regarding Claim 60:

Preamble and First limitation- the Examiner is of the opinion that there is no support in the specification for "responding to" or "receiving a search query from a user", and has indicated that a user is not mentioned until page 11, line 8 of the specification. However, on page 3, lines 8-10 it is clearly stated that an input set of sites is generated by a user providing a topic or topic words (i.e. a search query) and generating, for example by one or more search engine(s) and/or Internet indexes, a list of sites relevant to that topic. Support for the remainder of the limitations of claim 60 are as indicated previously and in conjunction with the present response with respect to other claims.

Regarding Claim 61:

Preamble- the Examiner is of the belief that presenting filtered hubs to a user is not the same as providing search results to a user. However, the specification clearly indicates, at page 9, line 29 through page 12, line 22 and in Fig. 2, that in some embodiments of the invention, a search is conducted using a keyword which provides an initial set of results, and then various operations are optionally performed on those search results before they are presented to the user. These optional operations can generate the filtered hubs. These filtered hubs, which are ultimately presented to the user, are based on search results obtained by the initial search. Therefore, when these filtered hubs are presented to a user, at least some of the search results are presented to the user.

Moreover, the claimed method is a search method. Therefore, if a user inputs a search term using the method and subsequently filtered hubs derived from the method are presented to the user, those filtered hubs can themselves be the search results. The provision of filtered hubs as search results to a user is described at page 11, page 8.

Second limitation- In addition to the previously supplied support, the specification indicates on page 8, lines 10-15 that a user uses a search engine for finding sites of interest on the Internet. In the search engine, a user provides terms and the engine responds with a list of sites that include some of the terms. As an example of an indexed search, the application describes

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performing a keyword search at page 9, line 31. Support for the remainder of the limitations of claim 61 are as indicated previously and in conjunction with the present response with respect to other claims.

35 USC §102(e)

Claims 59-65 are rejected under 35 USC §102(e) as being anticipated by US Patent 6,421,675 to *Ryan, et al.* ("the '675 patent"). Applicants disagree with the Examiner that claims 59-62 are anticipated by the '675 patent because the Examiner has failed to establish a *prima facie* case for anticipation under §102(e).

Not all of the elements of claims 59-60 are described by the '675 patent. Claims 59 and 60 indicate that relevance scores are assigned to search results based on cross references between the results. In contrast, the portion of the '675 patent that the Examiner cited, col. 6, lines 12-16, indicates that relevance is determined by the web pages "relevance to the key word". Further analysis of the '675 patent indicates that this "relevance to the key word" is determined by observing user behavior and tabulating a) the cumulative number of significant visits to each web site corresponding to each key word; b) the previous number of cumulative significant visits; and, c) a date time factor relating to the instant of the creation or input of each web page. Col. 12, lines 15-42. What is significantly missing in this description of how keywords and web sites are linked is a measure of cross references between web sites generated by the user search. In fact, nowhere in the '675 patent is it described or suggested that a measure of the cross references between search results is used in order to determine relevance. Therefore, claims 59 and 60 and their dependent claims 63 and 64, are not anticipated by the '675 patent since search result relevance is determined differently (*i.e.* in the present claims: based on cross references between documents and in the '675 patent: by observing user behavior towards the results).

Regarding claims 61-62, the Examiner has not shown where in the '675 patent the step of: generating a set of search results responsive to the number of links from the limited set of pages to the limited list of results, is described. Instead, the Examiner has cited to col. 1, lines 19-22 and 25-28 which is the Background section of the '675 patent and which does not describe in any way generating search result based on a number of links. In fact, the portion to which the Examiner cites explicitly states that results are generated by scanning for the specific key word(s) entered by a user in web site addresses and web site text. Providing results based on the appearance of a particular key word and providing results based on a number of cross referencing hyperlinks

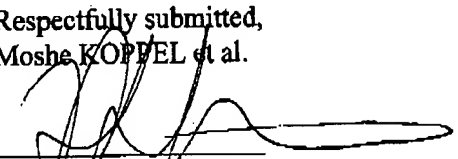
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between the search results are two different concepts. As a result, claim 61 is not anticipated and neither are its dependent claims 62 and 65.

In view of the foregoing amendments and arguments, Applicants believe the claims are in a condition for allowance. Notice to this effect is respectfully requested.

If the Examiner is unable to agree that the claims are all patentable, he is respectfully requested to contact Maier Fenster at toll free 1 (877) 428-5468. This number connects directly to our office in Israel. Please note that Israel is 7 hours ahead of Washington, D.C. and that our work week is Sunday-Thursday.

Respectfully submitted,
Moshe KOPPEL et al.


Todd A. SERBIN
Reg. No. 45,087

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Roy N. Envall, Jr.
c/o Anthony Castorina
2001 Jefferson Davis Highway, Suite 207
Arlington, VA 22202

Tel: (703) 415-1581